

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Policies and Rules Concerning) CC Docket No. 94-129
Unauthorized Changes of Consumers')
Long Distance Carriers)

REPLY

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BellSouth Telecommunications, Inc. ("BellSouth")
herewith submits these reply comments in the above-
referenced rulemaking. BellSouth remains concerned by the
level of unauthorized primary interexchange carrier (PIC)
conversions within its region. Evidence abounds that these
occurrences are often traceable to misleading marketing
practices which are employed to obtain letters of agency
(LOAs). Proposals contained in the Notice of Proposed Rule
Making¹ which restrict LOA content and formatting should
lower the incidence of marketing abuse and appear capable of
implementation without imposing an unreasonable burden on
interexchange providers.

The present comments address a single issue of the
NPRM, i.e., the proposal that LOAs identify only the carrier
establishing rates for the long distance service provided an
end user (the "marketing carrier").² As explained below,
implementation of this requirement will in some cases

¹ Policies and Rules Concerning Unauthorized Changes
of Consumers' Long Distance Carriers, CC Docket No. 94-129,
Notice of Proposed Rule Making, 9 FCC Rcd 6885 (1995)
(hereinafter "NPRM").

² NPRM, para. 14.

produce an inconsistency between the PIC shown on an LOA and the provider of interexchange service identified on a customer's telephone bill.

DISCUSSION

Currently the provider of interexchange service named on a customer's telephone bill rendered by BellSouth is determined by the carrier identification code (CIC). CICs are issued by Bellcore to facility-based interexchange carriers (IXCs). Thus, BellSouth has no present capability for bill identification of companies which market to end users but do not own transmission facilities and do not have a CIC.

Such capability could be achieved through the creation of a coding system to assign and maintain pseudo-CICs for non-facility-based IXCs. While it is possible for each local exchange carrier (LEC) to create a method for assigning pseudo-CICs, the better approach is a national system of code administration and maintenance. The latter alternative would enable non-facility-based IXCs to retain the same billing carrier code nationally and would avoid duplication of this function by every LEC.

Absent a national system, it would be necessary for BellSouth to designate a central point of contact for billing carrier code assignment. This assignment would have to be reflected in several system databases, to include Carrier Account Record Exchange (CARE), Customer Record

Information System (CRIS) and Carrier Access Billing System (CABS).

At present, CARE is the vehicle for submission of most PIC change requests. Because this is a national system, BellSouth (or other LEC wishing to implement this change) would be required to petition the Ordering and Billing Forum (OBF) for a record expansion which would introduce a new field for the billing carrier code. It is estimated that action on a formatting modification would require an interval of four to six months. Following determination of the new CARE format, a number of internal systems used in PIC provisioning and billing would also require modification and conversion of existing databases.³ Given the millions of subscriber records contained in the databases, this task is expected to take an additional three to five months for completion. The above-described modifications would enable each end user account to be identified with a facility-based IXC for traffic network routing and--where appropriate--a non-facility-based IXC for billing.⁴ With this feature, a facility-based IXC could submit PIC changes through CARE both for itself and for non-facility-based IXCs using its

³ These systems are CASI, SOCS, SOER, CARE, Electronic Bonding, CRIS, CABS and PSIMS. To accommodate PIC change requests submitted by end users to BellSouth business offices, additional modifications would be needed to the customer support systems of RNS, DOE, SONGS and Overture.

⁴ Of course, in some cases the routing carrier and the billing carrier will be the same entity.

network.⁵

In summary, approximately nine months would be required to effect all modifications necessary to identify non-facility-based IXCs in BellSouth billing systems and on end user bills. This time could be further extended by competing requirements which impact the same billing systems. For example, BellSouth has scheduled two Numbering Plan Area (NPA) splits during 1995, requiring the conversion of large customer record databases. In addition, BellSouth may be ordered by one or more state public service commissions to implement intraLATA toll presubscription. Both these projects must draw upon the same resources needed to accomplish the billing modification described above.

CONCLUSION

A Commission requirement to identify only the marketing carrier on an LOA may result in customer confusion where a different provider of interexchange service is designated on the end user bill. BellSouth billing systems can be modified to allow identification of non-facility-based IXCs; however, such modifications--requiring conversion of large customer databases--will take an estimated nine months to complete. Further, a national coding system for non-

⁵ BellSouth will not accept an order from any IXC to route traffic to the network of another IXC. For this reason, only facility-based IXCs can submit PIC orders.

facility-based IXCs should be considered in provisioning this capability. Such an approach appears to offer significant advantages over a plurality of systems separately created and administered by individual LECs.

Respectfully submitted,

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DATE: February 8, 1995

CERTIFICATE OF SERVICE

I hereby certify that I have this 8th day of February, 1995, served the parties to this action, with a copy of the foregoing REPLY, by placing a true and correct copy of same in the United States mail, postage prepaid, addressed to the parties as set forth on the attached service list.

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